

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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<b>In re REGIONS MORGAN KEEGAN SECURITIES, DERIVATIVE and ERISA LITIGATION</b>	) Case No.: 09-md-2009 SHM
	)
	)
	)
This Document Relates To:	) )
	)
<i>In re Regions Morgan Keegan Closed-End Fund Litigation,</i>	) )
Master Case No: 2:07-cv-2830-SHM-dkv	) )
	)
<i>Jones v. Morgan Keegan &amp; Co., Inc.,</i>	) )
Case No. 2:10-cv-2248-SHM-dkv	) )
	)
<i>Palmour v. Morgan Keegan &amp; Co., Inc.,</i>	) )
Case No. 2:10-cv-2380-SHM-dkv	) )
	)

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**MOTION OF THE RMK INVESTOR GROUP  
FOR CONSOLIDATION, APPOINTMENT AS LEAD  
PLAINTIFF, AND APPROVAL OF SELECTION OF COUNSEL**

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PLEASE TAKE NOTICE that Class members the Lion Fund LP, Dr. J. Samir Sulieman, Jimmie L. Moon, and Larry Lattimore (collectively, the “RMK Investor Group”), by their counsel, hereby move this Court for an order: (1) consolidating the above-captioned, related actions; (2) appointing the RMK Investor Group as Lead Plaintiff; (3) approving the RMK Investor Group’s selection of Labaton Sucharow LLP as Lead Counsel and Branstetter, Stranch & Jennings, PLLC as Liaison Counsel; and (4) granting such other and further relief as the Court may deem just and proper. In support of this motion, the RMK Investor Group submits herewith a Memorandum of Law and the Declaration of J. Gerard Stranch, IV.

Dated: July 2, 2010

Respectfully submitted,

/s/ J. Gerard Stranch, IV

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**CERTIFICATE OF CONSULTATION**

Lead Plaintiff Movants the Lion Fund LP, Dr. J. Samir Sulieman, Jimmie L. Moon, and Larry Lattimore (collectively, the “RMK Investor Group”) respectfully request exemption from Local Rule 7.2(a)(1)(B) requiring counsel for the parties to the action to consult prior to the filing of a motion. Pursuant to the Court’s June 2, 2010 Order Denying Plaintiff C. Fred Daniels’ Motion to Sever and Establishing Deadline for Motions to Serve as Lead Plaintiff (Dkt. #158), any interested party may file a motion seeking appointment as lead plaintiff by July 2, 2010. As of the filing of this motion, the RMK Investor Group cannot know all of the parties who may file lead plaintiff motions in this matter and, thus, respectfully request exemption from the consultation requirement.

Dated: July 2, 2010

Respectfully submitted,  
/s/ J. Gerard Stranch, IV

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### CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2010, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following participating CM/ECF participants:

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